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September 30, 2008

EPA Region 10
Solid Waste and Toxics Unit
1200 Sixth Ave, Suite 900
Seattle WA 98101
Attn: Dan Duncan

Recycling
& Recovery

Marine &
Industrial Cleaning

Recycled Products

Waste Treatment
& Disposal

Automotive Fluids
Management

Construction
Services

Transportation
Services

Vacuum Truck
Services

Portable Storage

RE: Unmanifested Waste Report – Emerald Recycling

Dear Mr. Duncan;

As you are aware, Emerald Recycling (Emerald) received a load of PCB contaminated oil from North County (Snohomish County). North County has indicated that the PCB contaminated oil was household hazardous waste, and therefore exempt from TSCA regulation. However, from recent discussions with EPA, it seems there are still questions regarding the regulatory status of this oil. With that in mind, Emerald is providing reports to EPA that would be required if the PCB contaminated oil is fully regulated. The attached information is being provided per the requirements for an unmanifested waste report under 40 CFR Part 761.211.

1) EPA Identification Number, Name and Address of the PCB
Commercial Storage or Disposal Facility:

Temporary Storage: Emerald Recycling
1500 Airport Way S.
Seattle WA 98134
WAD 058 367 152

TSDF: Clean Harbors (Aragonite), LLC
11600 N. Aptus Rd, Exit 56
Aragonite UT 84029
UTD 981 552 177

2) Date the commercial storage or disposal facility received the
unmanifested PCB waste:

Unmanifested PCB waste was received on September 15, and 16, 2008
at Emerald Recycling.

USEPA REG



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Your Partner for Recycling and Environmental Services

Corporate Office: 7343 E. Marginal Way So. • Seattle, WA 98108 • (206) 832-3000 • 1-888-832-3008 • Fax (206) 832-3030

3) The EPA Identification Number, Name, and Address of the Generator and Transporter:

Generator: North County
Snohomish County Solid Waste Division
19600 63rd Ave NE
Arlington WA 98223
WAD 988 467 031

Transporter: Emerald Services, Inc.
7343 East Marginal Way S.
Seattle WA 98108
WAD 058 364 647

4) A description of the Type and Quantity of the Unmanifested PCB Waste Received at the Facility:

600 gallons of PCB contaminated used oil contributing to contamination of approximately 16,500 gallons of used oil at the Emerald Recycling facility.

5) A Brief Explanation of Why the Waste was Unmanifested:

The generator was unaware that the used oil was contaminated with PCBs.

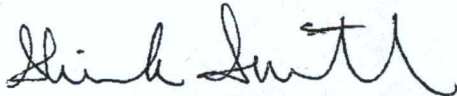
6) The Disposition Made of the Unmanifested Waste by the Commercial Storage or Disposal Facility:

The unmanifested waste was temporarily stored in tanks at the Emerald Recycling facility located on Airport Way in Seattle until disposal arrangements could be made for the waste. Of the contaminated volume of approximately 16,500 gallons, 30,101 kg of contaminated oil was shipped from the Emerald facility on September 23, 2008, and 26,102 kg of contaminated oil was shipped from the Emerald facility on September 24, 2008. After those volumes were shipped, approximately 1500 gallons of contaminated used oil remained in the tank. This oil was transferred to drums and will be shipped for disposal on October 3, 2008. All shipments coordinated by Emerald were, and will be, accompanied by a Uniform Hazardous Waste Manifest.

The generator of this PCB contaminated used oil has indicated to Emerald that the contamination was from an exempt source. Therefore, it is their position that a uniform hazardous waste manifest is not required. However, as mentioned above, due to the questions from EPA regarding this issue, Emerald is reporting this PCB contamination to EPA as if it is fully regulated.

Emerald will provide a complete report to EPA regarding receipt, on-site management, and off-site shipment of this PCB contaminated used oil once all documents pertaining to the issue have been received. This report from Emerald will include details of on-site decontamination of tanks, and copies of certificates of disposal from the TSDF (Clean Harbors). If you have any questions in the meantime, please feel free to contact me at the numbers below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sheila Smith', with a stylized flourish at the end.

Sheila Smith, Environmental Coordinator
Emerald Services, Inc.
(206) 832-3204 (Office)
(253) 370-7912 (Cell)
(206) 832-3304 (fax)
sheilas@emeraldnw.com

cc: Facility Operating Record
Jim Gustafson, MRW Supervisor, Snohomish County Solid Waste Division